

September 27, 2004

Tony Anastas, Clerk
United States District Court
Donohue Federal Building and Courthouse
595 Main Street
Worcester, Massachusetts 01608

Re: Stern v. University of Massachusetts et als.
Civil Action NO. 04-30176

Dear Mr. Anastas,

Enclosed for filing in the above referenced civil action, please find one document. This document is a letter from Gladys Rodriguez, Associate Dean of Students, relative to conversations plaintiff and the Dean of Students were having in an attempt to resolve this situation between the University of Massachusetts Health Services and plaintiff.

Please note the date of this letter. The date is August 29, 2004. In this letter Gladys Rodriguez makes mention that Bernie Melby suggested that this plaintiff pay the amount, then seek a refund. At the University of Massachusetts at Amherst, Bernie Melby is the refund mechanism. Plaintiff's affidavit regarding conversation with Dan McGuffin is supportive of this fact.

This letter indicates also that the Director of Health Services, Bernie Melby, will not release the hold on the plaintiff's account.

Please mark this letter as Exhibit "10" in the above referenced action.

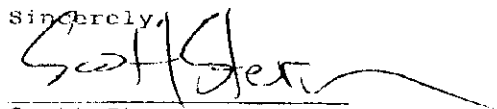
Please note that the date the letter is written, and the comments made by Bernie Melby, the inference can be made that the bill has not been paid as of yet and there is an outstanding amount for this bill.

Plaintiff herein requests that this document be marked as Exhibit "10". The reason for this submission is to allow the court to better understand the Policies at the University of Massachusetts at Amherst and their conduct accordingly in the above referenced action.

Pursuant to Federal Rules of Civil Procedure 28 (j) the reason for this submission is to clarify the action pending and to seek an immediate Temporary Restraining Order against the defendants.

Thank you.

Sincerely,



Scott Stern
Pro-Se Plaintiff
400 West Main Street
North Adams, Massachusetts 01247

Cc: Geoffrey B. McCullough (with enclosure)



UNIVERSITY OF MASSACHUSETTS
AMHERST

406B Goodell Building
University of Massachusetts
140 Hicks Way
Amherst, MA 01003-9272

Student Loans/Campus Receivables

voice: 413.545.2377
fax: 413.577.2120
www.umass.edu/aco/sl

August 23, 2004

Scott Stern
400 West Main St.
North Adams, MA 01247

Re: Tuition bill # 15367709

Due Date: 09/30/04

Dear Mr Stern:

Our files indicate an outstanding balance on your account for \$ 885.00. Despite multiple bills issued by the Bursar's Office, the balance remains unpaid.

If you wish to dispute the balance due, you must contact this office at (413) 545-2377 on or before the due date of this notice to discuss the nature of your dispute.

This letter will serve as your **FINAL NOTICE**. It is being sent to notify you of the payment options available to you and the possible consequences of continued non-payment.

If you do not dispute the balance, you may forward your payment to us in the enclosed envelope. If you agree that the balance is accurate, but are unable to pay in full at this time, please call our office to discuss payment options. We have monthly billing programs available to assist you in resolving this balance. Every effort will be made to establish a reasonable repayment plan reflective of your ability to pay.

Regardless of which option you choose, you must be certain to respond on or before the due date shown above.

Unfortunately, if you fail to respond, we will have no alternative but to proceed by all legal means available to recover the amount due. These actions may include assignment of the outstanding balance to an outside collection agency, or an attorney for litigation. Both of these actions will result in additional costs assessed against the balance due. In addition, under MGL C.7A, C.62D and 815 CMR 9.00, any unpaid balances may be subject to late charges and processing fees, and intercept of State payment or Tax refunds.

We urge you to give this matter your immediate attention.

Sincerely,

Elizabeth B. Reardon
Collections Officer

Exhibit
11

North Adams, Massachusetts 01247

Cc: Geoffrey B. McCullough(with enclosure)

September 27, 2004

Tony Anastas, Clerk
United States District Court
Donohue Federal Building and Courthouse
595 Main Street
Worcester, Massachusetts 01608

Re: Stern v. University of Massachusetts et als.
Civil Action NO. 04-30176

Dear Mr. Anastas,

Enclosed for filing in the above referenced civil action, please find one document. This document is a letter from the Student Loans/Campus Receivables located at 406B Goodell Building, University of Massachusetts, 140 Hicks Way, Amherst, Massachusetts 01003. The writer of this letter is Elizabeth Reardon.

This letter verifies plaintiff's stipulation that a certified letter arrived demanding payment according to Massachusetts General Laws and Code of Massachusetts Regulations. During the times the bills were being issued by the Bursar's Office, plaintiff was in contact with the Dean of Students Office in an attempt to resolve the situation.

Plaintiff never willingly signed any contracts to borrow monies from the University for payment of any Student Health Insurance Plan.

Plaintiff contacted Elizabeth B. Reardon and explained the situation with this person. In no way did, the collections Officer refer to this bill as a "loan" or an amount that plaintiff had borrowed from the university. Furthermore, in the upper left corner of the letter the reference is made to Re: Tuition Bill#15367709 which is a reference to plaintiff's student identification number.

The letter refers to bills from the Bursar's Office for an outstanding amount, and does not refer to loans made on plaintiff's behalf.

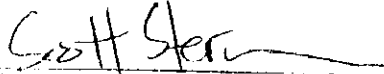
Please mark this letter as Exhibit "11" in the above referenced action.

The reason for this submission is to allow the court to better understand the Policies at the University of Massachusetts at Amherst and their conduct accordingly in the above referenced action.

Pursuant to Federal Rules of Civil Procedure 28 (j) the reason for this submission is to clarify the action pending and to seek an immediate Temporary Restraining Order against the defendants.

Thank you.

Sincerely,



Scott Stern
Pro-Se Plaintiff
400 West Main Street

University of Massachusetts-Amherst:
Fees for Academic Year 2003-2004 (by semester)
UNDERGRADUATE PART-TIME STUDENTS
 Includes NC= Non-Classified & SP= Special Students

Health Services
 577-5192

Tuition: Billed by the credit
 In-State \$71.50
 Out-of-State \$414.00
 NE Regional \$107.25

tuition:

<u>IN-STATE</u>	<u>OUT OF STATE</u>	<u>NEW ENGLAND REGIONAL</u>
1cr \$71.50	1cr \$414.00	1cr \$107.25
2cr \$143.00	2cr \$828.00	2cr \$214.50
3cr \$214.50	3cr \$1,242.00	3cr \$321.75
4cr \$286.00	4cr \$1,656.00	4cr \$429.00
5cr \$357.50	5cr \$2,070.00	5cr \$536.25
6cr \$429.00	6cr \$2,484.00	6cr \$643.50
7cr \$500.50	7cr \$2,898.00	7cr \$750.75
8cr \$572.00	8cr \$3,312.00	8cr \$858.00
9cr \$643.50	9cr \$3,726.00	9cr \$965.25
10cr \$715.00	10cr \$4,140.00	10cr \$1,072.50
11cr \$786.50	11cr \$4,554.00	11cr \$1,179.75

TWELVE (12) CREDITS OR MORE= FULL TIME BILLING

MANDATORY FEES

One to Five Credits

	<u>MASS. RESIDENT/NE REGIONAL</u>	<u>NON-RESIDENT</u>
Service Fee	\$402.00	\$402.00
Activities Fee	\$ 14.00	\$ 14.00
Curriculum Fee	\$620.00	\$725.00
*Only five credits must also pay:		
Mandatory Health Fee	\$266.00	\$266.00

Six to Eleven Credits

Service Fee	\$559.50	\$559.50
Activities	\$ 28.00	\$ 28.00
Curriculum	\$1240.50	\$1450.50
Mandatory Health Fee	\$266.00	\$266.00

OTHER CHARGES:

Late Payment Fee	\$ 50.00
Return Check Fee	\$ 25.00
Entering Fee Undergrad	\$ 178.00
Entering Fee Stockbridge	\$ 70.00
Graduating Fee	\$ 110.00
Engineering Fee:	
12+ Credits	\$ 160.00
6-11 Credits	110.00
1-5 Credits	60.00

WAIVABLE FEES:

Student Health Ins.	\$ 705.00
(now billed by Term)	
Spring Entry	\$23.00
Mass Pirg	\$ 7.00
Child Care	\$ 1.00

Have to have insurance before

1,447. more

Total Insurance \$2,418
6 months 403. month Jan 31, 2004

\$ 3236.00

Exhibit 11/24

September 27, 2004

Tony Anastas, Clerk
United States District Court
Donohue Federal Building and Courthouse
595 Main Street
Worcester, Massachusetts 01608

Re: Stern v. University of Massachusetts et als.
Civil Action NO. 04-30176

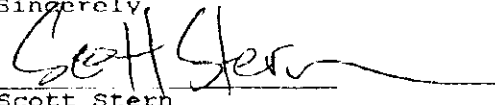
Dear Mr. Anastas,

Enclosed for filing in the above referenced civil action, please find one document. This document is a generic statement of costs associated with the 2003-2004 academic year at the University of Massachusetts at Amherst. Plaintiff herein requests that this document be marked as Exhibit "8". This document, provided by the Bursar's Office, has an encircled amount in the lower right hand corner. This amount is a Student Health Insurance amount of \$705.00 dollars. Directly above this circled reference is the underlined category "Waivable Fees". The reason for this submission is to allow the court to better understand the Policies at the University of Massachusetts at Amherst and their conduct accordingly in the above referenced action.

Pursuant to Federal Rules of Civil Procedure 28 (j) the reason for this submission is to clarify the action pending and to seek an immediate Temporary Restraining Order against the defendants.

Thank you.

Sincerely,



Scott Stern
Pro-Se Plaintiff
400 West Main Street
North Adams, Massachusetts 01247

Cc: Geoffrey B. McCullough(with enclosure)

OFFICIAL DOCUMENT

PERMANENT DOCUMENT NO.

Doc. T84-022

DOCUMENT TITLE Supplemental Health Benefits Plan--UM/Amherst

COMMITTEE A&SA

DATE May 21, 1984

PASSED BY THE BOARD 6/6/84

SUPPLEMENTAL HEALTH BENEFITS PLAN--
UM/AMHERST

That all students at the University of Massachusetts at Amherst be required to subscribe to the Supplemental Health Benefits Plan, except those who substantiate coverage under some other medical plan or insurance policy providing comparable benefits. (Doc. T84-022)

Date 6/7/84

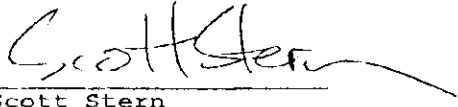
Changes in the vote, Document, etc.

Date _____

Exh. 614
" 12 "

Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Scott Stern", written over a horizontal line.

Scott Stern
Pro-Se Plaintiff
400 West Main Street
North Adams, Massachusetts 01247

Cc: Geoffrey B. McCullough (with enclosure)

September 27, 2004

Tony Anastas, Clerk
United States District Court
Donohue Federal Building and Courthouse
595 Main Street
Worcester, Massachusetts 01608

Re: Stern v. University of Massachusetts et als.
Civil Action NO. 04-30176

Dear Mr. Anastas,

Enclosed for filing in the above referenced civil action, please find one document. This document is titled Board of Trustees, and is dated June 6, 1984. Defendants and Defendants Counsel refer to this document as authorization that they could engage in mandating students below the minimum threshold established by the Massachusetts General Court.

The Qualifying Student Health Insurance Program was not established until September of 1989. Thus between 1984 and 1989 the University of Massachusetts simply mandated "all students". When the law became effective, in September 1989, the Board of Trustees should have modified their existing policies to reflect those changes. They did not. What they did do was deny thousands of students personal income. They denied these students their individual right to decide whether or not they wanted health insurance. The Board of Trustees, the University of Massachusetts Health Services, Chickering Group, Aetna Inc., after 1989, during the next fifteen years, conspired to defraud the class members. Please note there may have been other groups administering the plans after 1989 and only upon discovery will these parties be hereto named as co-defendants.

Defendants and Defendants counsel utilize this document as being "an official document" of which it is. However, what does not do is supercede Massachusetts General Law Chapter 15A Section 18, the Code of Massachusetts Regulations 114.6 CMR 3.00 and the Guidelines established by the Division of Health Care Finance and Policy.

Please mark this document as Exhibit "12" in the above referenced action.

As per the permission of the court, I am submitting this to the court through facsimile transmission.

Pursuant to Federal Rules of Civil Procedure 26 (j) the reason for this submission is to clarify the action pending and to seek an immediate Temporary Restraining Order against the defendants.

Mass.gov

mass.gov home - online services - state agencies

MASS.GOV



Massachusetts Division of Health Care Finance and Policy
Two Boylston Street
Boston, MA 02116-4737

(617) 988-3100
TTY (617) 988-3175

Mit Romney, Governor, Kerry Healey, Lt. Governor
Ronald Preston, Secretary, Executive Office of Health and Human Services
Paul Cote, Director, Commissioner

Resources for health care
in Massachusetts

Publications &
Policy Hearings

The Library
Health policy research, reports
and newsletters

The Uncompensated Care Pool

Data Center

Worker's Compensation

Your Guide to Managed Care

Student Health Insurance

About Us

What's New

Search this web site

Press Release

460,000 Massachusetts Residents Report They Have No Health Insurance

Uninsured Estimates

The Massachusetts Residents Health Insurance Survey
-includes 2004 results

DHCFP Cost Reporting Information and Software

- **Nursing Services**
- **Ambulance and Chair Car**

Acute Care Hospital Information Center

Financial Reports (Q2 FY04)
and Inpatient Profiles (FY03 Annual)

Review and Evaluation of Mandated Benefit Legislation

Prostate Cancer

Press Release

Paul Cote Will Lead Division of Health Care Finance and Policy
- Will Also Serve As Assistant Secretary for Health Services

Health Care Catalog

Access to Health Care in Massachusetts
- **A Catalog of Programs for Uninsured and Underinsured Individuals**

Analysis in Brief

Non-Emergent and Preventable ED Visits

Analysis in Brief

Massachusetts Inpatient Hospital Trends

Report to the General Court

Payments for Prescribed Drugs (pdf)

Health Insurance Survey of Massachusetts Employers

- **Comprehensive Results from the Survey**
- **Presentation to the Massachusetts Public Health Council (pdf)**

Massachusetts Maternity Statistics

Labor and Delivery Practices of Massachusetts' Hospitals and Birth Centers

Emergency Department Information

<http://www.mass.gov/dhcfp/>

9/26/2004

Exhibit
"6"

September 27, 2004

Tony Anastas, Clerk
United States District Court
Donohue Federal Building and Courthouse
595 Main Street
Worcester, Massachusetts 01608

Re: Stern v. University of Massachusetts et als.
Civil Action NO. 04-30176

Dear Mr. Anastas,

Enclosed for filing in the above referenced civil action, please find one document entitled Massachusetts Division of Health Care Finance and Policy, herein requested to be listed as Exhibit "6". The reason for this submission is to allow the court to better understand what website they may refer to in determining plaintiff's success on the merits of the above referenced civil action. This website is located at: <http://www.mass.gov/dhcfp/>. In the left column of this page is a link to Student Health Insurance.

Pursuant to Federal Rules of Civil Procedure 28 (j) the reason for this submission is to clarify the action pending and to seek an immediate Temporary Restraining Order against the defendants.

Thank you.

Sincerely,



Scott Stern
Pro-Se Plaintiff
400 West Main Street
North Adams, Massachusetts 01247

Cc: Geoffrey R. McCullough (with enclosure)

from to enroll in CP-Ship, it
is discretionary.
- He is sending letter.

Ph 617 988 3131
Mr. Getachew

02/09/04

2:10 pm.

Talked on 1/29/04, at 1:00 pm.

Mr. Getachew informed me
that his legal counsel
advised him "not to give
anything in writing".
- He says law is clear about
part-time - students.
- Students have to resolve
this problem with UMass
officials.

Gen. Dean of Students office - help

Exhibit
"14"

September 27, 2004

Tony Anastas, Clerk
United States District Court
Donohue Federal Building and Courthouse
595 Main Street
Worcester, Massachusetts 01608

Re: Stern v. University of Massachusetts et als.
Civil Action NO. 04-30176

Dear Mr. Anastas,

Enclosed for filing in the above referenced civil action, please find one document. This document is the handwritten notes referred to in the complaint of plaintiff in the above referenced action. This document represents the investigation by Suman Rastogi of the Student Legal Services Office at the University of Massachusetts at Amherst in the Spring of 2004.

This letter indicates several things, first, that this attempt at resolution has been an on-going process for several months. Two, this verifies and substantiates exactly what plaintiff was stipulating in his complaint to the court. Thirdly, it distinguishes and establishes that the Division of Health Care Finance and Policy employee, "Mr. Getachew" responded without proper direction and threw the issue back at plaintiff to seek restitution with University of Massachusetts officials.

As per the permission of the court, I am submitting this to the court through facsimile transmission.

Please mark this letter as exhibit 14 in the above referenced action.

Pursuant to Federal Rules of Civil Procedure 28 (j) the reason for this submission is to clarify the action pending and to seek an immediate Temporary Restraining Order against the defendants. Thank you.

Sincerely,



Scott Stern
Pro-Se Plaintiff
400 West Main Street
North Adams, Massachusetts 01247

Cc: Geoffrey B. McCullough (with enclosure)

My conversation with Mr. Getachew of Div. of Health Care, Finance

- Getachew from Div. of Healthcare*
- Students taking less than 9 credits*
- do not need to take Q-ship.*
- But UMass can't breathe on*

1115 Demonstration Waiver.

Mental Illness. Either:

- (a) nine "biologically based" mental disorders appearing in the most recent edition of the Diagnostic and Statistical Manual (DSM); or
- (b) rape-related mental disorders for victims of a rape or victims of an assault with intent to commit rape; or
- (c) a non-biologically-based mental, behavioral disorders described in the DSM that substantially interfere with or substantially limit the functioning of a student under the age of 19; or
- (d) any biologically based mental disorders appearing in the DSM that are scientifically recognized and approved by the Commissioner of the Department of Mental Health (DMH) in consultation with the Commissioner of the Division of Insurance (DOI); or
- (e) all other mental disorders described in the most recent edition of the DSM.

Mental Health Professional: A physician licensed to practice psychiatry, a licensed psychologist, and a licensed independent clinical social worker, a licensed mental health counselor, and a licensed mental health clinical specialist nurse.

~~Part-Time Student~~. A ~~student~~ who participates in at least 75% of the academic requirements for full-time students.

Pre-existing Condition. Pre-existing condition means any condition, which originates, is diagnosed, treated, or recommended for treatment within six months immediately prior to the insured effective date under the insurance policy.

Public Institution of Higher Education. A institution of higher education listed in M.G.L. c. 15A, s. 5, including for purposes of 114.6 CMR 3.00 Quincy College;

School Year. The 365 day period commencing on the first day of the fall semester at each institution of higher education;

~~Student~~. A full-time or ~~part-time student~~ enrolled in a degree-granting program at an institution of higher education.

Exhibit
"7C"

12/30/2004 12:00 PM

Display Reference Line

Code of Massachusetts Regulations

114.6 CMR DIVISION OF HEALTH CARE FINANCE AND POLICY MEDICAL

3.00: STUDENT HEALTH INSURANCE PROGRAM

3.02: Definitions

3.02: Definitions

The following terms as used in 114.6 CMR 3.00 have the following meanings, except where the context clearly indicates otherwise:

Carrier. An insurer licensed or otherwise authorized to transact accident and health insurance under M.G.L. c. 175; a non-profit hospital service corporation organized under M.G.L. c. 176A; a nonprofit medical service corporation organized under M.G.L. c. 176I3; a health maintenance organization organized under M.G.L. c. 176G; or an insured health benefit plan that includes a preferred provider plan approved under M.G.L. c. 176I.

Covered charges. The expenses which a carrier deems eligible for reimbursement under a health benefit plan;

Division. The Division of Health Care Finance and Policy established under M.G.L. c. 118G;

Free Care. Unpaid hospital or community health center charges for medically necessary services which are eligible for reimbursement from the Uncompensated Care Pool established at M.G.L. c. 118G, s. 18, and pursuant to the criteria set forth in 114.6 CMR 10.03. Types of free care include full free care, medical hardship, and emergency bad debt.

Full-time student. A ~~student~~ who meets the minimum academic requirements for full-time students as defined by the institution of higher education in which the ~~student~~ is enrolled;

Health benefit plan. Any health insurance program or other program through which an individual may obtain health benefits and services;

Independent institution of higher education. An institution of higher education maintained or conducted by any person, association, partnership, corporation or trust which furnishes or offers to furnish courses leading to an academic degree;

Institution of higher education. A public or independent institution of higher education located in Massachusetts;

Managed care program. A managed health benefit plan offered by a health maintenance organization organized under M.G.L. c. 176G, or an insured benefit plan that includes a preferred provider plan approved under M.G.L. c. 176I. "Managed care program" may also refer to an on-campus ~~student~~ health center.

The following text is effective 07/20/01

MassHealth. A Medicaid program administered by the Division of Medical assistance pursuant to M.G.L. c. 118E and in accordance with Title XIX of the Federal Social Security Act, and Section

Exhibit
#7B

12/30/2004 12:00 PM

GENERAL LAWS OF MASSACHUSETTS

PART I. ADMINISTRATION OF THE GOVERNMENT

TITLE II. EXECUTIVE AND ADMINISTRATIVE OFFICERS OF THE GOVERNMENT

CHAPTER 15A. PUBLIC EDUCATION

Chapter 15A: Section 18 Qualifying student health insurance programs; participation; compliance procedures report; penalties for noncompliance

Section 18. Every full-time and part-time student enrolled in a public or independent institution of higher learning located in the commonwealth shall participate in a qualifying student health insurance program. For the purposes of this section, "part-time student" shall mean a student participating in at least seventy-five percent of the full-time curriculum. Such an institution may elect to allow students to waive participation in its student health insurance program or any part thereof, provided, however, that an institution permitting such waivers shall require students waiving participation to certify in writing prior to any academic year in which they will not participate in the institution's plan that they are participating in a health insurance program having comparable coverages.

Each public and independent institution of higher education shall submit an annual report to the division of health care finance and policy detailing its procedures for complying with the provisions of this section; provided, however, that prior to the implementation of this section the division of health care finance and policy and the council shall submit a report to the house and senate committees on ways and means. Such a report shall include, but not be limited to, an analysis of the number of students lacking health insurance, the costs of the requirements of this section to the students and the public and independent institutions of higher education, and a proposed method for meeting such costs.

Any public or independent institution of higher learning failing to carry out its responsibilities under this section shall pay a penalty per student for every day during which the failure continues, equal to the penalty per employee per day imposed upon noncomplying employers by subsection (i) of section fourteen G of chapter one hundred and fifty-one A. Any penalties collected pursuant to this section shall be deposited in the public responsibility account of the medical security trust fund established by chapter one hundred and eighteen F. Any institution which, in accordance with regulations promulgated pursuant to this section, relies in good faith on statements by students relative to their health insurance status shall not be liable for any penalty or for failure to comply with the provisions of this section caused by misstatements of such students.

The division of health care finance and policy, with the advice and consent of the council, shall issue regulations to define qualifying student health insurance programs, to establish procedures to monitor compliance, and to implement the provisions of this section.

Return to:

<http://www.state.ma.us/legis/laws/mgl/15a%2D18.htm>

12/30/03

Exhibit
"7A"

Cc: Geoffrey B. McCullough (with enclosure)

September 27, 2004

Tony Anastas, Clerk
United States District Court
Donohue Federal Building and Courthouse
595 Main Street
Worcester, Massachusetts 01608

Re: Stern v. University of Massachusetts et als.
Civil Action NO. 04-30176

Dear Mr. Anastas,

Enclosed for filing in the above referenced civil action, please find three documents. The first is entitled "Massachusetts M.G.L. Chapter 15, Section 18" Plaintiff herein requests this to be marked as Exhibit "7A". The reason for this submission is to allow the court to better understand the Massachusetts General Law directly from the Massachusetts State Government website. This website directly confirms the likelihood of success on the merits in the above referenced action and may be found at: <http://www.state.ma.us/legis/laws/mgl/15a%2D18.htm>

In the first paragraph is the definition of part-time student. Part-time student shall mean a student participating in at least seventy-five percent of the full-time curriculum.

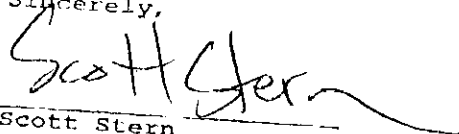
Part-time students are required to participate in a health insurance program with the school they are attending or a comparable program. Plaintiff is not, and was not, technically a "part-time" student at the University of Massachusetts at Amherst.

Plaintiff herein requests the two documents entitled "Social Law Library" to be marked as Exhibits "7B" and "7C". These two documents, located on the Social Law Library website, refer to the Code of Massachusetts Regulations and reiterate the definition of part-time student status.

Pursuant to Federal Rules of Civil Procedure 28 (j) the reason for this submission is to clarify the action pending and to seek an immediate Temporary Restraining Order against the defendants.

Thank you.

Sincerely,



Scott Stern
Pro-Se Plaintiff
400 West Main Street
North Adams, Massachusetts 01247

September 27, 2004

Tony Anastas, Clerk
United States District Court
Donohue Federal Building and Courthouse
595 Main Street
Worcester, Massachusetts 01608

Re: Stern v. University of Massachusetts et als.
Civil Action NO. 04-30176

Dear Mr. Anastas,

Enclosed for filing in the above referenced civil action, please find three documents. The first is entitled "Massachusetts M.G.L. Chapter 15, Section 18" Plaintiff herein requests this to be marked as Exhibit "7A". The reason for this submission is to allow the court to better understand the Massachusetts General Law directly from the Massachusetts State Government website. This website directly confirms the likelihood of success on the merits in the above referenced action and may be found at: <http://www.state.ma.us/legis/laws/mgl/15a%2D18.htm>

In the first paragraph is the definition of part-time student. Part-time student shall mean a student participating in at least seventy-five percent of the full-time curriculum.

Part-time students are required to participate in a health insurance program with the school they are attending or a comparable program. Plaintiff is not, and was not, technically a "part-time" student at the University of Massachusetts at Amherst.

Plaintiff herein requests the two documents entitled "Social Law Library" to be marked as Exhibits "7B" and "7C". These two documents, located on the Social Law library website, refer to the Code of Massachusetts Regulations and reiterate the definition of part-time student status.

Pursuant to Federal Rules of Civil Procedure 28 (j) the reason for this submission is to clarify the action pending and to seek an immediate Temporary Restraining Order against the defendants.

Thank you.

Sincerely,